

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,

Plaintiff,

v.

**RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Defendant.

Case No. 3:23-cv-00018-RSB

JOINT STATUS REPORT

Pursuant to the Scheduling Order (ECF No. 30), Plaintiff Jane Doe and Defendant Rector and Visitors of the University of Virginia (“University”), by and through counsel, submit the following joint status report.

Progress in Discovery

1. Discovery has progressed without problems. The parties have exchanged discovery requests and have scheduled, or are in the process of scheduling, depositions. The parties anticipate that they will be able to complete discovery by the deadline in the Scheduling Order.

Anticipated Dispositive Motions

2. The University anticipates that it will file a motion for summary judgment.

3. The parties anticipate that they will want to file exhibits under seal in connection with any motion for summary judgment due to most of the evidence in this matter containing Plaintiff’s real name and confidential and sensitive academic and medical information regarding Plaintiff and other University students. The parties have identified this as a potential issue and

have committed to conferring in good faith regarding what documents can be filed with redactions and what documents will need to be filed under seal.

Potential for Case Resolution

4. The parties have discussed settlement. The University is not currently interested in mediation.

Respectfully submitted,

JANE DOE

By: /s/ Devon J. Munro
Counsel

Devon J. Munro (VSB # 47833)
Munro Byrd, P.C.
120 Day Ave. SW, First Floor
Roanoke, Virginia 24016
Telephone: (540) 283-9343
Email: dmunro@trialsva.com

Elizabeth Abdnour
Pro Hac Vice
Abdnour Weiker, LLP
500 E. Michigan Ave., Ste. 130
Lansing, Michigan 48912
Telephone: (517) 994-1776
Email: liz@education-rights.com
Counsel for Plaintiff

THE RECTOR AND VISTORS OF THE
UNIVERSITY OF VIRGINIA

By: /s/ Christopher P. Bernhardt
Counsel

Christopher P. Bernhardt (VSB No. 80133)
Assistant Attorney General
Office of the Virginia Attorney General
202 North 9th Street
Richmond, Virginia 23219
Telephone: (804) 371-0977
Facsimile: (804) 371-2087
Email: cbernhardt@oag.state.va.us

Amy E. Hensley (VSB No. 80470)
Associate University Counsel/Assistant
Attorney General
Madison Hall
1827 University Avenue
Charlottesville, Virginia 22904
Telephone: (434) 924-3685
Email: aehensley@virginia.edu
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2024, the foregoing was filed with the Clerk of Court using the CM/ECF system, which will send notice of the same to all counsel of record.

/s/ Christopher P. Bernhardt

Christopher P. Bernhardt (VSB No. 80133)

Assistant Attorney General

Office of the Virginia Attorney General

202 North 9th Street

Richmond, Virginia 23219

Telephone: (804) 371-0977

Facsimile: (804) 371-2087

Email: cbernhardt@oag.state.va.us

Counsel for Defendant